

Chart A Dispute No.	Request	Court's Order
P12 9/24/21	Plaintiffs' RFP 30: Documents concerning any changes to Google's controls regarding private browsing mode that were proposed or considered but not adopted by Google.	DENIED. The topic is the subject of custodial searches. Additional searches for proposals that were not adopted are not proportional to the needs of the case.
P12 9/24/21	Plaintiffs' RFP 49: Google's technical documents relating to how Google tracks individual consumers, their devices, and their locations.	GRANTED in part; DENIED in part. The Court adopts Google's proposed compromise.
P12 9/24/21	Plaintiffs' RFP 50: Documents sufficient to identify all websites and publishers that use Google Analytics.	GRANTED in part; DENIED in part. The request as framed is DENIED, HOWEVER, before Google can argue or assert that any specific website did not use Google Analytics, Google must respond to this interrogatory as to that website at least 30 days in advance of making any such assertion or argument. Plaintiffs may serve an RFA directed at the number of websites and publishers that used Google Analytics during the class period.
P12 9/24/21	Plaintiffs' RFP 57: Documents sufficient to identify all websites and	GRANTED in part; DENIED in part. Google is ordered to annotate its interrogatory response to identify which of the 25 websites previously identified use Google Analytics UserID. Other than as set forth herein, the request is DENIED.

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	publishers that use Google Analytics UserID.	
P12 9/24/21	Plaintiffs' RFP 64: Documents sufficient to show all ways in which Google uses data gathered through Google cookies, including data collected in connection with users' activity while in a private browsing mode.	DENIED. The topic has been addressed through custodial searches.
P12 9/24/21	Plaintiffs' RFP 65: Documents sufficient to identify all websites and publishers that use Google Ad Manager.	GRANTED in part; DENIED in part. The request as framed is DENIED, HOWEVER, before Google can argue or assert that any specific website did not use Google Ad Manager, Google must respond to this interrogatory as to that website at least 30 days in advance of making any such assertion or argument. Plaintiffs may serve an RFA directed at the number of websites and publishers that used Google Ad Manager during the class period.
P12 9/24/21	Plaintiffs' RFP 68: Documents sufficient to show all ways in which Google uses data gathered through Google Ad Manager, including data collected in	DENIED. The topic has been addressed through custodial searches.

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	connection with users' activity while in a private browsing mode.	
P12 9/24/21	Plaintiffs' RFP 71: Documents sufficient to show all types and the amount of data collected with X-Client Data Header, GStatic, and Approved Pixels, including in connection with users' activity while in a private browsing mode.	DENIED. The X-Client Data Header issue is before the Special Master. To the extent this request seeks additional information beyond that issue, it is not proportional to the needs of the case.
P12 9/24/21	Plaintiffs' RFP 73: Documents sufficient to show all system or geolocation data collected by Google and associated, directly or indirectly, with any user or user device that has used private browsing mode.	DENIED. Overbroad.

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P12 9/24/21	Plaintiffs' RFP 75: Documents concerning Google's association of data collected while users are in private browsing mode with unique user profiles through Google Analytics User-ID.	DENIED. HOWEVER, Google must provide a verified written response to this RFP within 5 business days of this Order.
P12 9/24/21	Plaintiffs' RFP 102: Google's documents showing how Google improved its Google products and services (including but not limited to Search, Google Analytics, and Google Ad Manager) based on data Google obtained relating to the allegations at issue in the First Amended Complaint.	GRANTED in part; DENIED in part. Google must produce responsive documents as to Google Analytics and Google Ad Manager.
P12 9/24/21	Plaintiffs' RFP 103: Documents concerning all ways in which Google has	DENIED in part as duplicative and therefore overbroad; GRANTED in part. Google must produce all documents relating to Google's internal estimate as requested in the "discrete example" provided by Plaintiffs.

	benefited from the conduct alleged in this lawsuit, including without limitation advertising revenues, impact on Google's market power, and improvement or development of additional Google services or products.	
P12 9/24/21	Plaintiffs' RFP 104: All documents pertaining to Google's decision to collect user data while users are in private browsing mode, including any assessments of the value of such data to Google or the cost of avoiding collecting such data.	GRANTED as follows: Google to produce documents reflecting its assessments of the value to Google of collecting user data while users are in private browsing mode or its assessments of the costs of avoiding collecting such data.
P12 9/24/21	Plaintiffs' RFP 163: Documents concerning the extent to which Google's data privacy policies abide by or conflict with the laws in	GRANTED in part; DENIED in part. Google must produce responsive documents relating to the California Consumer Privacy Act (CCPA).

	various jurisdictions in which Google operates, including the EU General Data Protection Regulation 2016/679, the California Consumer Privacy Act (CCPA), and Lei Geral de Proteção de Dados (LGPD).	
P12 9/24/21	Plaintiffs' RFP 166: All internal dashboard information for Incognito mode, Google Analytics, and Google Ad Manager.	At the hearing, Google confirmed that it will produce responsive documents, and it must do so by the date indicated in this Order.